

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

STEVEN HANSON and RANDALL
PELLETIER, on behalf of themselves and all
others similarly situated,
PLAINTIFFS

v.

SCOTT R. JENSEN, in his official capacity
as Director of the Rhode Island Department of
Labor and Training
DEFENDANT

**TEMPORARY RESTRAINING ORDER
REQUESTED**

Case Number: 20-cv-00232

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiffs, on behalf of themselves and all persons similarly situated, hereby move the Court, pursuant to Federal Rule of Civil Procedure 65, for an order temporarily restraining and preliminarily enjoining Defendant from violating 42 U.S.C. § 503 and implementing regulations, and the Due Process Clause of the Fourteenth Amendment of the United States Constitution, for the reasons set forth in the memorandum of law attached hereto and upon the declarations of Plaintiffs Hanson and Pelletier submitted herewith.

Plaintiffs seek a temporary restraining order and a preliminary injunction enjoining Defendant 1) from hereinafter stopping, suspending, or terminating Unemployment Insurance benefits (UI) to current UI recipients, including the named Plaintiffs, without adequate written notice; and (2) to immediately resume payment of UI benefits to Plaintiff Hanson and individual class members whose weekly UI benefits were stopped without notice, as well as payment to them of retroactive benefits for each week that benefits were withheld.

Plaintiffs request oral argument on this motion. Plaintiffs anticipate that an evidentiary hearing of not more than one day may also be required.

Prior to filing this motion, on May 21, 2020 undersigned counsel notified Miriam Weizenbaum of the Department of Attorney General, of the within motion, and today provided electronic copies of the Complaint and the within Motion and supporting documents.

Respectfully submitted,

/s/ Ellen Saideman

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Cooperating counsel
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CERTIFICATE OF SERVICE

I hereby certify that I filed the within document via the ECF system on this day 27th day of May, 2020 and that it is available for viewing and downloading to all counsel of record and that I provided the within document by email to:

Brenda Baum
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Miriam Weizenbaum
mweizenbaum@riag.ri.gov

/s/ Ellen Saideman

Ellen Saideman, Esq.